

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI**

IN RE: Beckham Jewelry, LLC, Debtor

**Case No. 25-01234
CHAPTER 11**

AMENDED APPLICATION OF DEBTOR IN POSSESSION TO EMPLOY COUNSEL

COMES NOW, Beckham Jewelry, LLC (the "Debtor"), by and through the undersigned counsel, pursuant to 11 U.S.C. § 327(a) and Federal Rule of Bankruptcy Procedure 2014, and hereby respectfully moves this Court to approve the employment of The Rollins Law Firm, PLLC as attorney for the Debtor in Possession. In support of this application, the Debtor states as follows:

1. On May 14, 2025, the Debtor filed a voluntary petition for relief under Chapter 11 of the Bankruptcy Code in the United States Bankruptcy Court for the Southern District of Mississippi.
2. The Debtor wishes to employ The Rollins Law Firm, PLLC as its attorney in this Chapter 11 case.
3. The professional services to be rendered by The Rollins Law Firm, PLLC include, but are not limited to, advising the Debtor on all matters which are now anticipated to arise in the functioning of this proceeding.
4. The Rollins Law Firm, PLLC is competent to represent the Debtor in all matters which are now anticipated to arise in the functioning of this proceeding.
5. To the best of the Debtor's knowledge, The Rollins Law Firm, PLLC has no adverse interest to the Debtor or the estate and has no connection with the creditors or other parties in interest or their respective attorneys.
6. The proposed terms of employment for The Rollins Law Firm, PLLC are as follows:
 - a. Thomas Rollins' hourly rate is \$400 per hour;

- b. Jennifer Calvillo's hourly rate is \$360 per hour.
 - c. Paralegals will bill at \$155 per hour;
 - d. Legal assistants will bill at \$100 per hour;
7. Any retainer received will be applied against the fees and expenses incurred before any additional fees will be sought.
8. The Bankruptcy Code allows for the employment of professionals, including attorneys, on reasonable terms and conditions, subject to court approval. 11 U.S.C. § 327(a)
9. The proposed terms of employment, including the hourly rates, are reasonable and in line with prevailing market rates for attorneys with similar experience and expertise in bankruptcy matters.
10. The employment of The Rollins Law Firm, PLLC is necessary and in the best interests of the Debtor and the estate to ensure proper representation throughout the Chapter 11 proceedings.

WHEREFORE, the Debtor respectfully requests that this Court enter an order:

- A. Authorizing the employment of The Rollins Law Firm, PLLC as attorney for the Debtor in Possession;
- B. Approving the terms of employment as set forth in this application; and
- C. Granting such other and further relief as this Court deems just and proper.

Respectfully submitted,

Beckham Jewelry, LLC, APPLICANT

BY:

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.
Its Attorney

Thomas C. Rollins, Jr. (MSBN 103469)
The Rollins Law Firm, PLLC
P.O. Box 13767
Jackson, MS 39236
601-500-5533
trollins@therollinsfirm.com

CERTIFICATE OF SERVICE

I, Thomas C. Rollins, Jr., do hereby certify that a true and correct copy of the above and foregoing Notice and Application were forwarded on May 23, 2025, to:

By Electronic CM/ECF Notice:

U.S. Trustee

/s/ Thomas C. Rollins, Jr.
Thomas C. Rollins, Jr.

**IN THE UNITED STATES BANKRUPTCY COURT
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AFFIDAVIT OF ATTORNEY

STATE OF MISSISSIPPI
COUNTY OF HINDS

I, Thomas C. Rollins, Jr., being duly sworn, hereby depose and say:

1. I am an attorney duly admitted to practice law in the State of Mississippi and before the United States District Court for the Southern District of Mississippi. I am a partner of The Rollins Law Firm, PLLC (the "Firm"), which maintains its principal office at 40 Northtown Drive, Jackson MS 39211.
2. This Affidavit is submitted pursuant to 11 U.S.C. § 327(a) and Federal Rule of Bankruptcy Procedure 2014(a) in support of the application of Beckham Jewelry, LLC (the "Debtor") for an order approving the employment of myself and the Firm as attorneys for the Debtor in Possession in the above-captioned Chapter 11 case (the "Case"). This Case was filed on May 14, 2025, in the United States Bankruptcy Court for the Southern District of Mississippi (the "Court").
3. To the best of my knowledge, I do not represent any interest adverse to the Debtor or its estate in the matters upon which I am to be engaged. I am a "disinterested person" as that term is defined in 11 U.S.C. § 101(14). The Firm, its partners, of counsel, and associates:
 - a. are not creditors, equity security holders, or insiders of the Debtor;
 - b. are not and were not, within two years before the Petition Date, directors, officers, or employees of the Debtor; and

- c. do not have an interest materially adverse to the interest of the estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtor, or for any other reason.
- d. The U.S. Trustee has raised a potential conflict concerning the Jewelry Retainer paid to The Rollins Law Firm, PLLC, based on the discovery of a UCC financing statement asserting a blanket lien on the Debtor's property. The retainer was received in the ordinary course of business, and the validity of the alleged lien is questionable. The retainer has not been drawn upon and remains securely held in trust. The Rollins Law Firm is prepared to return the Jewelry upon entry of an appropriate Order by the Court and will not take possession of the Jewelry unless and until fees are properly approved and express authorization is granted by the Bankruptcy Court.

FURTHER, AFFIANT SAITH NOT.

Dated this the 14th day of May, 2025.

X IT

By: Thomas Rollins

SWORN TO AND SUBSCRIBED BEFORE ME, this the 22nd day of May, 2025.



Shaton Andrews
NOTARY PUBLIC